claiming to own the same in fee simple against the whole world and have paid all taxes of every kind levied or assessed against the property during the continuous period of 33 years prior to the filing of this Bill of Complaint.

SEVENTEENTH: That your Complainants desire to have said cloud upon their title to the property which is the subject of these proceedings removed so that they may have a good and marketable fee simple title and may sell and convey or otherwise deal with such property without regard to the aforesaid cloud upon their title; that although your Complainants hold a valid, fee simple title to the aforesaid property, the same cannot be established of record without the removal of the aforesaid cloud upon the title of your Complainants. That your Complainants have no adequate remedy at law.

TO THE END, THEREFORE:

- 1. That this Honorable Court may take jurisdiction in the premises and enter a Decree quieting title to the real estate mentioned and described in this Bill of Complaint and remove the cloud from the title thereof.
- 2. That this Court shall declare that your Complainants have a good and marketable fee simple title to the property mentioned in the Bill of Complaint and may sell, convey, or otherwise deal with such property without regard to any possible claim of the aforesaid persons mentioned in said Bill of Complaint.

May it please your Honors to grant unto your Complainants a Writ of Subpoena to be issued to resident Defendants, Howell C. Happ, Jr. and Shirley L. Happ, his wife, their heirs, personal representatives and assigns, and any and all other persons having or claiming an interest in and to all the tract or parcel of land known and described in Exhibit "A", Braddock Heights, Frederick County, State of Maryland, of the object and substance of this Bill of Complaint warning them to be and appear in this Court, in person, or by solicitor, to show cause, if any they have, why a decree ought not to be passed as prayed.

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